



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM/CRH/MS
F. #2021R01110

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 30, 2023

By ECF and Email

David G. Lazarus, Esq.,
Michael K. Fee, Esq.,
Verrill Dana
1 Federal Street, 20th Floor
Boston, MA 02210
dlazarus@verrill-law.com
mfee@verrill-law.com
Attorneys for Alexey Brayman

Nora Hirozawa, Esq.,
Earl Alexander Kirkland, III, Esq.,
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
earl_kirkland@fd.org
nora_hirozawa@fd.org
Attorneys for Vadim Yermolenko

Sabrina P. Shroff, Esq.,
80 Broad Street, 19th Floor
New York, NY 20004
sabrinaschroff@gmail.com
Attorney for Vadim Konoshchenok

Re: United States v. Yevgeniy Grinin et al.
Criminal Docket No. 22-409 (S-2) (HG)

Dear Counsel:

Please find, at the USAfx file exchange location provided to you via email, materials that are being produced in accordance with the government's discovery obligations. These materials are being produced pursuant to the Supplemental Protective Order in this matter. See ECF No. 81. Pursuant to that Order, some of the items have been marked as "Sensitive Discovery" and should be handled accordingly. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Please find enclosed the following materials:

Description	Bates Begin	Bates End
Department of Commerce Reports (Sensitive Discovery)	001441	001492

Description	Bates Begin	Bates End
Global Test Equipment, Inc. Records (Sensitive Discovery)	01493	001547
Keysight Technologies Records (Sensitive Discovery)	001548	001548
Records Associated with Items Seized in Estonia (Sensitive Discovery)	001549	001680
Deutsch Bank Records	001681	001694
SpectraDynamics Records (Sensitive Discovery)	001695	001740
ValueTronics Records (Sensitive Discovery)	001741	001800
Draft Transcription of Interview (Sensitive Discovery)	001801	002000
Department of Commerce License Determinations	002001	002026

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Matthew Skurnik
Artie McConnell
Craig R. Heeren
Matthew Skurnik
Assistant U.S. Attorneys
(718) 254-6231

cc: Clerk of the Court (HG) (by ECF) (without enclosures)